

Exhibit 3

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI

FANNIE MAE,

Plaintiff,

v.

ORON ZARUM

Defendant.

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Case No. 5:24-cv-06053-JAM

AFFIDAVIT OF NICHOLAS J. ZLUTICKY IN SUPPORT OF PLAINTIFF'S MOTION
FOR DEFAULT JUDGMENT AGAINST ORON ZARUM

STATE OF MISSOURI)
)
COUNTY OF JACKSON)

ss.

NICHOLAS J. ZLUTICKY, being duly sworn, of lawful age and sound mind, states as follows:

1. I am an attorney duly licensed to practice in the Western District of Missouri. I am a partner with the law firm of Stinson LLP ("Stinson"). I have practiced law since October 2008, and I practice in the area of bankruptcy and creditors' rights. I have personal knowledge of the facts stated in this affidavit.

2. Attached hereto as Schedule 1 are detailed billing statements setting forth the work performed and the time expended by Stinson for Plaintiff Fannie Mae ("Fannie Mae") in the above-captioned case. Schedule 1 also contains the billing rates for the attorneys and paralegals who have worked and who are working on this case. Such time was reasonably expended to deal with the legal matters of Fannie Mae in this case. Such services and time were specifically requested by Fannie Mae and were required in the ordinary course of the case. The total amount of Stinson attorney and paralegal fees, costs and expenses charged in these cases up through June 21, 2024 is

\$58,528.74.

3. The fees, costs and expenses set forth on the attached Schedule 1 fall into the following categories:

- a. reviewing loan documents;
- b. preparing and sending demand letter;
- c. preparing paperwork for foreclosure on property in Missouri;
- d. publish notice of foreclosure on property in Missouri;
- e. drafting petition and complaint;
- f. obtaining and serving summons and petition;
- g. preparing and filing proposed scheduling order; and
- h. miscellaneous other matters.

4. Based on my experience in cases such as this case, and based on the nature of these cases, I believe that the attorneys' fees and expenses incurred by Fannie Mae to date are reasonable and represent a market rate for attorneys with practices similar to my practice.

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FURTHER AFFIANT SAYETH NAUGHT.



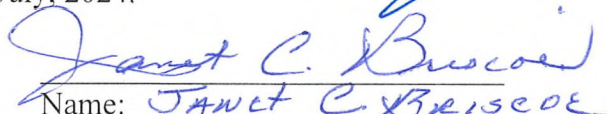
Nicholas J. Zluticky

Subscribed and sworn before me this 15TH day of July, 2024.



My commission expires:

07-21-2025


Name: JANET C. BRISCOE
Notary Public

Schedule 1

STINSON

1201 Walnut Street, Suite 2900
Kansas City, MO 64106-2150
1.800.846.1201

June 21, 2024

Fannie Mae
Legal Department Office Manager
3900 Wisconsin Ave, NW
Washington, DC 20016-2892

Invoice No: Draft
Nicholas Zluticky

Re: Brittany Village Apartments
File No: 0772514.0056

Invoice Summary

Professional services and disbursements rendered through June 21, 2024

Current Professional Services	\$53,057.50
Current Disbursements	\$5,471.24
Total Current Invoice	\$58,528.74

Payment Terms: Net 30
Tax ID #44-0643135

Timekeeper Summary

Timekeeper	Title	Rate	Hours	Amount
Anthony Cali	Partner	460.00	46.90	21,574.00
Nicholas Zluticky	Partner	465.00	17.80	8,277.00
Zachary Hemenway	Partner	465.00	1.10	511.50
Michael Pappas	Associate	335.00	31.20	10,452.00
Miranda Swift	Associate	340.00	31.90	10,846.00
Cheryl Duren	Paralegal	240.00	0.80	192.00
Lisa Parks	Paralegal	245.00	1.60	392.00
Lisa Parks	Paralegal	240.00	2.70	648.00
MacKenzie Stewart	Paralegal	275.00	0.60	165.00
Current Professional Services			134.60	\$53,057.50

Professional Services

Date	Timekeeper	Description	Rate	Hours	Amount
02/02/23	Nicholas Zluticky	Begin review of loan documents (0.6).	465.00	0.60	279.00
02/03/23	Nicholas Zluticky	Meeting with client regarding case background and strategy (0.5).	465.00	0.50	232.50
02/07/23	Nicholas Zluticky	Edits to demand letter (0.1); email draft to client for review (0.1); review and analyze question regarding obligation to fund replacement reserve and email to client regarding same (0.3); email to borrower regarding communications with servicer (0.1).	465.00	0.60	279.00
02/07/23	Michael Pappas	Review loan documents and prepare acceleration letter.	335.00	1.30	435.50
02/09/23	Nicholas Zluticky	Review communications from borrower regarding repair reserve (0.2).	465.00	0.20	93.00
02/13/23	Nicholas Zluticky	Email to client regarding acceleration letter (0.1).	465.00	0.10	46.50

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Date	Timekeeper	Description	Rate	Hours	Amount
02/21/23	Michael Pappas	Draft receivership documents.	335.00	2.70	904.50
02/23/23	Michael Pappas	Finish initial drafts of receivership documents.	335.00	0.90	301.50
03/01/23	Nicholas Zluticky	Edits to receivership documents.	465.00	0.30	139.50
03/08/23	Nicholas Zluticky	Email to client regarding status of receivership (0.1); edits to receivership documents (0.3).	465.00	0.40	186.00
03/08/23	Michael Pappas	Additional edits to receivership documents.	335.00	0.50	167.50
03/13/23	Michael Pappas	Revisions to receivership documents.	335.00	1.00	335.00
03/15/23	Nicholas Zluticky	Email to client regarding borrower's request for extension (0.1).	465.00	0.10	46.50
03/20/23	Michael Pappas	Revisions to receivership documents.	335.00	1.00	335.00
03/24/23	Michael Pappas	Compile all documents for filing of receivership action.	335.00	0.50	167.50
03/24/23	Lisa Parks	Review of email from Mr. Pappas regarding filing of new complaint in Buchanan County MO; draft motion and order for process server; electronically mark exhibits to petition and motion to appoint received; access Buchanan county court and electronically open case, add party information, pay filing fee and electronically file petition with exhibits, motion to appoint receiver with exhibits and proposed order and motion to appoint process server and proposed order.	245.00	1.00	245.00
03/25/23	Nicholas Zluticky	Email to client regarding filing of receivership action.	465.00	0.10	46.50
03/29/23	Lisa Parks	Email to process server including	245.00	0.10	24.50

Stinson LLP**Invoice Detail**

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Invoice No: Draft

Date	Timekeeper	Description	Rate	Hours	Amount
		petition and summons and motion to appoint receiver to be served upon defendant.			
03/29/23	Lisa Parks	Access Court docket and download petition with exhibits, summons, motion to appoint receiver with exhibits for service upon defendant and compile same to send to process server.	245.00	0.50	122.50
03/30/23	Michael Pappas	Prepare reservation of rights letter.	335.00	0.30	100.50
04/05/23	Michael Pappas	Prepare notice of hearing on emergency motion for appointment of a receiver and arrange for service of the same.	335.00	0.60	201.00
04/11/23	Michael Pappas	Email opposing counsel re upcoming hearing (.3); prepare outline for upcoming hearing (.9); review removal documents filed by Defendant (.3); call with president of St. Joe United Way (.4); contact court (.2).	335.00	2.00	670.00
04/11/23	Lisa Parks	Access Buchanan County court and electronically file return of service for defendant.	240.00	0.20	48.00
04/12/23	Michael Pappas	Contact court and send updates on scheduled hearings (.4); continue drafting outline for scheduled emergency teleconference (1.8).	335.00	2.20	737.00
04/17/23	Nicholas Zluticky	Review foreclosure report.	465.00	0.30	139.50
04/17/23	Michael Pappas	Review foreclosure report.	335.00	0.40	134.00
04/18/23	Michael Pappas	Email client on teleconference.	335.00	0.10	33.50
04/18/23	Michael Pappas	Draft appointment of successor trustee.	335.00	0.30	100.50
04/19/23	Michael Pappas	Assist in preparation for teleconference (1); finalize	335.00	1.50	502.50

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Invoice No: Draft

Date	Timekeeper	Description	Rate	Hours	Amount
		appointment of successor trustee and send to client (.5).			
04/23/23	Michael Pappas	Draft reservation of rights letter.	335.00	0.50	167.50
04/24/23	Nicholas Zluticky	Review defendant's opposition brief to motion to appoint receiver (0.6); research regarding issues raised in brief (1.1); draft direct examination outline for James Noakes (1.4); telephone conversations with Mr. Noakes regarding same and current property condition (0.3); emails with client regarding opposition brief and hearing (0.4).	465.00	3.80	1,767.00
04/24/23	Michael Pappas	Review response brief filed by Defendant and research issues related to the same (1); prepare binder for receivership hearing (.6).	335.00	1.60	536.00
04/25/23	Nicholas Zluticky	Prepare outline of argument for hearing on motion for appointment of receiver (1.3); prepare for (0.6) and represent client at hearing on motion for appointment of receiver (1.7); emails with client regarding same and next steps (0.2).	465.00	3.80	1,767.00
04/25/23	Michael Pappas	Prepare for receivership hearing and research case law rebutting arguments made in Defendant's response brief (.5; attend receivership hearing (1.5); revise Order and submit to the Court (.9).	335.00	2.90	971.50
04/26/23	Nicholas Zluticky	Review signed order appointing receiver (0.1); emails with client and receiver regarding same (0.2).	465.00	0.30	139.50
04/26/23	Cheryl Duren	E-record Appointment of Successor Trustee with Buchanan	240.00	0.40	96.00

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Date	Timekeeper	Description	Rate	Hours	Amount
		Co, MO.; Follow-up regarding same.			
04/27/23	Nicholas Zluticky	Emails with receiver regarding bond requirements and filing (0.2).	465.00	0.20	93.00
04/27/23	Michael Pappas	File Receiver's bond.	335.00	0.40	134.00
05/01/23	Michael Pappas	Review foreclosure process, determine newspaper to advertise in and set timeline.	335.00	0.60	201.00
05/02/23	Nicholas Zluticky	Email to client regarding question on receiver's certificate.	465.00	0.10	46.50
05/02/23	Michael Pappas	Research additional newspapers to advertise in that meet statutory requirements and contact the same.	335.00	0.30	100.50
05/03/23	Michael Pappas	Continue reviewing proper newspaper to publish in light of limited publications in St. Joe.	335.00	0.40	134.00
05/04/23	Michael Pappas	Prepare notice of sale.	335.00	1.20	402.00
05/09/23	Nicholas Zluticky	Email to court regarding scheduling conference.	465.00	0.10	46.50
05/10/23	Michael Pappas	File notice in receivership case.	335.00	0.30	100.50
05/16/23	Michael Pappas	Research proper method of publication when applicable newspaper does not advertise daily (.5); call numerous newspapers to inquire about how often they publish (.5); summarize research (.5).	335.00	1.50	502.50
06/02/23	Michael Pappas	Prepare draft plan of discovery.	335.00	2.00	670.00
06/09/23	Michael Pappas	Finalize and file report of planning.	335.00	0.50	167.50
06/13/23	Michael Pappas	File report of planning.	335.00	0.30	100.50
06/20/23	Michael Pappas	Prepare for and attend scheduling conference.	335.00	1.80	603.00

Stinson LLP**Invoice Detail**

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Date	Timekeeper	Description	Rate	Hours	Amount
06/21/23	Michael Pappas	Calendar scheduling order dates.	335.00	0.20	67.00
06/22/23	Michael Pappas	Prepare designation of neutral.	335.00	0.40	134.00
06/27/23	Lisa Parks	Access Western District of MO court and electronically file designation of neutral per Mr. Zluticky.	240.00	0.20	48.00
06/28/23	Cheryl Duren	Order Delaware UCC search.	240.00	0.20	48.00
07/03/23	Michael Pappas	Draft notices.	335.00	1.00	335.00
07/28/23	Nicholas Zluticky	Emails with client regarding cancellation of trustee's sale (0.2).	465.00	0.20	93.00
07/28/23	Zachary Hemenway	Prepare for foreclosure sale.	465.00	0.50	232.50
09/02/23	Nicholas Zluticky	Email to borrower's counsel regarding status of trustee's sale (0.1).	465.00	0.10	46.50
09/13/23	Nicholas Zluticky	Draft revised notice of trustee's sale (.3); email to newspaper (.1).	465.00	0.40	186.00
09/16/23	Anthony Cali	Communications with Mr. Zluticky regarding Apex Brittany bankruptcy filing; review notice of filing and record in district court receivership case.	460.00	0.60	276.00
09/16/23	Nicholas Zluticky	Review voluntary bankruptcy filing (0.6); emails with client regarding same (0.3); review caselaw in Delaware regarding unauthorized bankruptcy filings (1.8); analyze issues regarding same (1.1).	465.00	3.80	1,767.00
09/18/23	Anthony Cali	Draft motion to dismiss bankruptcy case (3.1); draft declaration of receiver in support of same (.8).	460.00	3.90	1,794.00
09/19/23	Anthony Cali	Revise motion to dismiss and draft request for judicial notice.	460.00	0.90	414.00

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Date	Timekeeper	Description	Rate	Hours	Amount
09/22/23	Anthony Cali	Draft proposed order granting motion to dismiss (.4); communications with Mr. Zluticky regarding motion to dismiss (.2).	460.00	0.60	276.00
10/02/23	Nicholas Zluticky	Email to client regarding status of motion to dismiss bankruptcy case (0.1).	465.00	0.10	46.50
10/03/23	MacKenzie Stewart	Analyze motion as received, review client file, correspond with Mr. Zluticky and Ms. Duren.	275.00	0.60	165.00
10/06/23	Nicholas Zluticky	Email to client regarding purchase offer for real estate (0.1).	465.00	0.10	46.50
10/09/23	Nicholas Zluticky	Telephone conversation with Bill Taylor regarding motion to dismiss and upcoming hearing on same (0.4).	465.00	0.40	186.00
10/11/23	Nicholas Zluticky	Email to borrower's counsel regarding unauthorized bankruptcy filing (0.1); review response to motion to dismiss and alleged purchase and sale agreement (0.7); email to client regarding same (0.1).	465.00	0.90	418.50
10/13/23	Anthony Cali	Communications with Mr. Taylor regarding hearing procedures.	460.00	0.40	184.00
10/16/23	Anthony Cali	Communications with local counsel and opposing counsel regarding stipulation to change hearing date.	460.00	0.30	138.00
10/17/23	Anthony Cali	Review and revise pro hac vice application.	460.00	0.30	138.00
10/20/23	Anthony Cali	Review Debtor's response to motion to dismiss; analyze cases cited therein; prepare outline for hearing on motion to dismiss.	460.00	2.70	1,242.00

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Date	Timekeeper	Description	Rate	Hours	Amount
10/23/23	Anthony Cali	Travel and prepare for hearing on motion to dismiss bankruptcy case.	460.00	8.30	3,818.00
10/24/23	Anthony Cali	Prepare for and attend hearing on motion to dismiss (2.3); communications with Debtor's counsel (.3); return travel from hearing (6.5); draft summary of hearing for client (.2).	460.00	9.30	4,278.00
10/25/23	Anthony Cali	Call with Debtor's counsel regarding potential sale (.5); communications with receiver regarding same (.2).	460.00	0.70	322.00
10/25/23	Anthony Cali	Review and analyze procedural posture and rulings of district court proceedings.	460.00	0.60	276.00
10/25/23	Anthony Cali	Review case law on preclusion issues in preparation for drafting letter brief.	460.00	0.50	230.00
10/27/23	Anthony Cali	Research case law and draft letter brief on jurisdictional issues.	460.00	3.80	1,748.00
10/27/23	Anthony Cali	Communications with Debtor's counsel regarding potential sale; follow up with Mr. Zluticky and receiver regarding same.	460.00	0.40	184.00
10/30/23	Anthony Cali	Draft letter brief on jurisdictional matters in support of motion to dismiss bankruptcy case.	460.00	4.80	2,208.00
10/31/23	Anthony Cali	Draft, revise and finalize letter brief in support of motion to dismiss (3.1); review and analyze debtor's letter brief (.4).	460.00	3.60	1,656.00
10/31/23	Anthony Cali	Communications with Receiver regarding status of bankruptcy case.	460.00	0.30	138.00
11/02/23	Anthony Cali	Communications with chambers and debtor's counsel regarding matters related to motion to	460.00	0.30	138.00

Date	Timekeeper	Description	Rate	Hours	Amount
		dismiss.			
11/07/23	Anthony Cali	Communications with Receiver and Debtor's counsel regarding potential sale.	460.00	0.30	138.00
11/12/23	Anthony Cali	Communications with Mr. Taylor and Mr. Zluticky regarding objection to Debtor's sale motion and motion to extend deadline to file schedules.	460.00	0.20	92.00
11/14/23	Anthony Cali	Draft objection to sale motion; communications with Mr. Taylor and Mr. Zluticky regarding same.	460.00	1.20	552.00
11/15/23	Anthony Cali	Communications with Mr. Taylor and Debtor's counsel regarding postponement of hearing on sale motion.	460.00	0.60	276.00
11/27/23	Anthony Cali	Review memorandum order regarding motion to dismiss bankruptcy case; communications with Mr. Zluticky and Mr. Taylor regarding same.	460.00	0.40	184.00
11/27/23	Miranda Swift	Review both Delaware and Missouri dockets and calendar hearing times.	340.00	0.40	136.00
11/28/23	Miranda Swift	Draft Motion for Order to Show Cause and Order to Show Cause; Draft Notice of Trustee's Sale.	340.00	2.10	714.00
11/29/23	Nicholas Zluticky	Review notice of trustee's sale (0.2); email to client regarding same (0.1).	465.00	0.30	139.50
12/01/23	Anthony Cali	Follow up with Mr. Taylor regarding entry of order dismissing case.	460.00	0.30	138.00
12/01/23	Anthony Cali	Review communication from Mr. Tancredi regarding potential purchaser of property.	460.00	0.10	46.00

Stinson LLP**Invoice Detail**

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Date	Timekeeper	Description	Rate	Hours	Amount
12/05/23	Anthony Cali	Communications with receiver and debtor's counsel regarding dismissal of bankruptcy case.	460.00	0.30	138.00
12/05/23	Miranda Swift	Review and edit Notice of Trustee's Sale (0.2); coordinate with St. Joseph Daily Courier regarding publication of same (0.1).	340.00	0.30	102.00
12/06/23	Anthony Cali	Review order dismissing bankruptcy case; communicate dismissal to receiver.	460.00	0.30	138.00
12/06/23	Miranda Swift	Finalize draft of Notice of Trustee's sale (0.1); email communication with St. Joseph Daily Courier and N. Zluticky regarding the same (0.2).	340.00	0.30	102.00
12/07/23	Miranda Swift	Review Notice of Trustee's Sale (0.4); draft email to client regarding same (0.1).	340.00	0.50	170.00
12/11/23	Miranda Swift	Review and send Notice of Trustee's Sale to St. Joseph Daily Courier for publication.	340.00	0.20	68.00
12/12/23	Miranda Swift	Review proof of Notice of Trustee's Sale to ensure exact match of legal descriptions of the property.	340.00	0.50	170.00
12/13/23	Anthony Cali	Communications with Debtor's counsel regarding prospective buyers (.2); follow up with Mr. Zluticky regarding same (.2).	460.00	0.40	184.00
12/18/23	Miranda Swift	Draft Trustee's Affidavit, Sale Script, and Successor Trustee's Deed Under Sale.	340.00	1.00	340.00
12/19/23	Miranda Swift	Review and edit Notice of Trustee's Sale and Notice of UCC Sale Letters.	340.00	0.30	102.00
12/21/23	Miranda Swift	Review Western District of Missouri docket for additional	340.00	0.60	204.00

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Invoice No: Draft

Date	Timekeeper	Description	Rate	Hours	Amount
		parties to send Notice of Trustee's Sale and Notice of UCC Sale letters to (0.5); draft email to client regarding same (0.1).			
12/22/23	Miranda Swift	Send out Notice of Trustee's Sale and Notice of UCC Sale Letters (0.1); review updated foreclosure report (0.1).	340.00	0.20	68.00
01/02/24	Miranda Swift	Review and revise foreclosure sale documents.	340.00	0.60	204.00
01/05/24	Miranda Swift	Call Reed Sewer Service in regards to updated address.	340.00	0.20	68.00
01/08/24	Miranda Swift	Review Borrower's request for updated payoff.	340.00	0.10	34.00
01/10/24	Miranda Swift	Review and prepare foreclosure notebook for the foreclosure sale (0.5); Order a UCC search and review search (0.2); Email with St. Joseph Daily Courier regarding Affidavit of Publication (0.1).	340.00	0.80	272.00
01/10/24	Cheryl Duren	Order UCC search from Missouri Secretary of State; Follow-up regarding same.	240.00	0.20	48.00
01/11/24	Miranda Swift	Finish preparing foreclosure notebook for sale.	340.00	0.90	306.00
01/12/24	Miranda Swift	Pickup Affidavit of Publication (0.5); Review Affidavit of Publication and add it to the foreclosure notebook (0.3); Travel to and from St. Joseph, Missouri (2.5); Conduct foreclosure sale (0.5); Review and prepare Trustee's Deed and Trustee's Affidavit (0.7).	340.00	4.50	1,530.00
01/22/24	Miranda Swift	Prepare Trustee's Deed and Deed to be recorded (0.6); Send same to be recorded (0.1).	340.00	0.70	238.00

Stinson LLP**Invoice Detail**

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Invoice No: Draft

Date	Timekeeper	Description	Rate	Hours	Amount
01/23/24	Miranda Swift	Review loan documents for ability to collect on deficiency and recourse on mortgage.	340.00	1.00	340.00
01/24/24	Miranda Swift	Continued review of loan documents to determine recourse (0.6); Draft email to Mr. Zluticky regarding same (0.1).	340.00	0.70	238.00
01/30/24	Miranda Swift	Research regarding dismissal of bankruptcy cases and effect of triggering default under contract.	340.00	0.30	102.00
01/31/24	Miranda Swift	Draft email to client regarding recorded and sent documents.	340.00	0.10	34.00
02/12/24	Miranda Swift	Draft entry of appearance.	340.00	0.40	136.00
03/05/24	Miranda Swift	Review docket and pleadings in preparation for scheduling conference.	340.00	0.40	136.00
03/08/24	Miranda Swift	Review scheduling order for deadline to add claims and join parties in Fannie Mae v. APEX Brittany case (0.1); Confirm Mr. Zarum's state of residence (0.2).	340.00	0.30	102.00
03/11/24	Miranda Swift	Draft deficiency petition against Oron Zarum.	340.00	1.70	578.00
03/12/24	Miranda Swift	Continue drafting deficiency petition against Oron Zarum.	340.00	1.30	442.00
03/13/24	Miranda Swift	Complete drafting of deficiency petition against Oron Zarum.	340.00	0.80	272.00
03/18/24	Miranda Swift	Review and compile exhibits for deficiency petition (0.5); Review and edit petition (0.7).	340.00	1.20	408.00
04/11/24	Miranda Swift	Review and revise complaint and exhibits in preparation for filing.	340.00	1.50	510.00
04/11/24	Miranda Swift	Research regarding local rules in Western District of Missouri and Federal Rules of Civil Procedure regarding summons, service, and filing initial complaint.	340.00	0.50	170.00

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Date	Timekeeper	Description	Rate	Hours	Amount
04/12/24	Miranda Swift	Draft and research Western District of Missouri civil coversheet and summons (0.6); Continue research regarding Western District of Missouri Local Rules and Federal Rule of Civil Procedure (0.6); Call and various communications with Ms. Parks to file complaint (0.8).	340.00	2.00	680.00
04/12/24	Lisa Parks	Access Western District of MO court website to electronically open new case, add party information, pay filing fee and upload initiating documents including complaint with multiple exhibits A-K per and Disclosure Statement per Ms. Swift.	240.00	0.80	192.00
04/15/24	Anthony Cali	Review draft proposed order and sale agreement (.3); communications with Ms. Brady regarding same (.2).	460.00	0.50	230.00
04/15/24	Miranda Swift	Draft entry of appearance (0.4); Communications with Ms. Parks regarding service (0.2).	340.00	0.60	204.00
04/15/24	Lisa Parks	Download file-stamped copies of pleadings from court docket to include in service packet to forward to process server for service upon defendant.	240.00	0.20	48.00
04/15/24	Lisa Parks	Phone call to process server regarding service of defendant in NJ.	240.00	0.10	24.00
04/16/24	Miranda Swift	File entry of appearance (0.2); Discussion with Ms. Parks regarding process server (0.2).	340.00	0.40	136.00
04/16/24	Lisa Parks	Arrange for paper copies of service packet including summons and complaint for forwarding to process server for	240.00	0.30	72.00

Stinson LLP**Invoice Detail**

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Invoice No: Draft

Date	Timekeeper	Description	Rate	Hours	Amount
		service.			
04/26/24	Lisa Parks	Research on Mr. Zarum to find possible current address.	240.00	0.20	48.00
04/26/24	Lisa Parks	Phone call and email to process server regarding status of service of defendant.	240.00	0.10	24.00
05/02/24	Miranda Swift	Review request for scheduling order.	340.00	0.10	34.00
05/10/24	Lisa Parks	Access Western District of MO court and electronically file return of service of summons for defendant.	240.00	0.10	24.00
05/10/24	Lisa Parks	Review of invoice from process server for service of defendant, arrange for payment of same.	240.00	0.10	24.00
05/29/24	Zachary Hemenway	Follow up on finalization of pleadings.	465.00	0.20	93.00
05/29/24	Miranda Swift	Research regarding application for entry of default in Western District of Missouri (1.1); draft notice of intent to apply for entry of default and application for entry of default (1.0).	340.00	2.10	714.00
05/29/24	Lisa Parks	Phone call to court clerk regarding filing application for default judgment.	240.00	0.10	24.00
05/29/24	Lisa Parks	Email communications with Ms. Swift regarding filing application for default judgment.	240.00	0.10	24.00
05/29/24	Lisa Parks	Review of file for samples of applications for clerk's entry of default judgment and motion for default judgment.	240.00	0.20	48.00
06/10/24	Miranda Swift	Draft joint stipulation of dismissal without prejudice	340.00	0.60	204.00
06/11/24	Miranda Swift	Review and revise Motion for Entry of Default.	340.00	0.40	136.00

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Date	Timekeeper	Description	Rate	Hours	Amount
06/12/24	Zachary Hemenway	Review and follow up on motion and notice.	465.00	0.40	186.00
06/12/24	Miranda Swift	Review and revise Motion for Entry of Default (0.1); Draft email to Mr. Zluticky and Mr. Hemenway regarding the same (0.1).	340.00	0.40	136.00
06/13/24	Miranda Swift	Prepare Motion for Entry of Default to be filed (0.4); Call with court clerk regarding Motion for Entry of Default (0.1); Draft Certificate of Service (0.4); Prepare and file Certificate of Service (0.1).	340.00	0.90	306.00
Current Professional Services				134.60	\$53,057.50

Disbursements

Date	Description	Amount
03/24/23	Federal express Inv: # 808307052 Tracking No: 396193502619 To: Apex Brittany MO LP 10 Hill St Newark, NJ 07102	28.12
03/24/23	Federal express Inv: # 808307052 Tracking No: 396193532644 To: Oron Zarum 10 Hill St Newark, NJ 07102	28.12
03/24/23	Federal express Inv: # 808307052 Tracking No: 396193555987 To: Corporate Creations Network In 12747 Olive Blvd Ste 300 St Louis, MO 63141	16.11
03/28/23	Fannie Mae Brittany Village Petition filed	94.00
03/31/23	Service of Subpeona to HPS Process Service & Investigations for Service on Apex Brittany MO/Corp Creations Network on Invoice HAT-2023005760	146.95
04/04/23	Report copy from to Preferred Title of St Joseph, LLC for Foreclosure Report on Invoice 20230418202	500.00
04/27/23	Appointment of Successor Trustee - Buchanan County, MO	37.00
06/21/23	Recording fees to Preferred Title of St Joseph, LLC for Recording Fees 1601-1807 N. 36th St & 1401-1515 N. 36th St. on Invoice 06212023	150.00
06/28/23	Search - UCC to Registered Agent Solutions, Inc for DE Search for Apex Brittany MO LP on Invoice 1658922	122.00

Stinson LLP**Invoice Detail**

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Date	Description	Amount
07/31/23	Publication/Advertisement fee to St Joseph Daily Courier for Publications on Invoice DC1197	500.00
08/07/23	Federal express Inv: # 822494002 Tracking No: 782176830571 To: Steven Sixberry 5440 Louie Lane, Suite 106 Reno, NV 89511	21.22
08/07/23	Federal express Inv: # 822494002 Tracking No: 782176726988 To: Greg Hughes 5440 Louie Lane, Suite 106 Reno, NV 89511	21.22
08/07/23	Federal express Inv: # 822494002 Tracking No: 782176471283 To: Versailles SPE LLC (Borrower 5440 Louie Lane, Suite 106 Reno, NV 89511	21.22
08/07/23	Federal express Inv: # 822494002 Tracking No: 782176786045 To: Kyle Krch 5440 Louie Lane, Suite 106 Reno, NV 89511	21.22
09/18/23	Recording fees to St Joseph Daily Courier for publication of notice of trustee's sale from 8/29/2023 to 9/18/2023 on Invoice DC1209	500.00
10/06/23	Publication/Advertisement fee to St Joseph Daily Courier for Trustee's Sale Notice - Publication on Invoice DC1216	500.00
10/21/23	Airfare for travel from/to Phoenix, AZ to Philadelphia, PA and then from Philadelphia, PA to Phoenix, AZ on 10/23/2023 - 10/24/2023 for Travel for Hearing - airfare to PHX-PHL on 10/23/2023 and return PHL-PHX 10/24/2023	906.80
10/21/23	Hotel - Lodging on 10/23/2023 - 10/24/2023 Travel for Hearing	218.90
10/23/23	Dinner for Travel for Hearing for Anthony P Cali	15.50
10/23/23	Taxi for Travel for Hearing - uber from train station to hotel pre-hearing	11.81
10/23/23	Train for PHL airport to Hotel for Travel for Hearing	6.75
10/23/23	Parking for Travel for Hearing	32.00
10/23/23	Train for Amtrak from Philadelphia to Wilmington, DE for Travel for Hearing	5.00
10/23/23	Train for Amtrak from Wilmington, DE to Philadelphia for Travel for Hearing	28.00
10/24/23	Breakfast for Travel for Hearing for Anthony P Cali	13.38
10/24/23	Train for From Hotel to PHL airport for Travel for Hearing	6.75
10/24/23	Taxi for Travel for Hearing - uber from train station to hotel pre-hearing	11.02
12/22/23	Recording fees to Preferred Title of St Joseph, LLC for Foreclosure Report on Invoice 12222023	150.00
01/10/24	Search - UCC to Registered Agent Solutions, Inc for UCC Search (MO) - Apex Brittany Mo LP on Invoice 1782274	40.00

Stinson LLP**Invoice Detail**

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Invoice No: Draft

Date	Description	Amount
01/12/24	Recording fees to St Joseph Daily Courier for Trustee Sale Notice publication - Apex Brittany on Invoice DC1241	500.00
01/22/24	Ship Date: 01/22/2024 Inv: # 839362875 Tracking No: 270078695245 To: Attn Jennifer Holden Preferred Title of St Joseph, 2402 N Woodbine Rd ST JOSEPH, MO 64506 From: Miranda Swift Stinson LLP 1201 Walnut St KANSAS CITY, MO 64106	14.67
01/23/24	Recording fees to Preferred Title of St Joseph, LLC for Recorders fees and e-filing fee on Invoice 20230418202-012324	131.00
01/30/24	Ship Date: 01/30/2024 Inv: # 840069456 Tracking No: 270404881427 To: James Noakes Granite Park VII 5600 GRANITE PKWY PLANO, TX 75024 From: Miranda Swift Stinson LLP 1201 Walnut St KANSAS CITY, MO 64106	27.08
04/15/24	New complaint filing	405.00
05/10/24	Service of Summons to D & B Legal Services LLC for Service of Summons & Complaint on Defendant on Invoice POW-2024005594	240.40
Total Disbursements		\$5,471.24

Stinson LLP**Invoice Detail**

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Outstanding AR Summary

Date	Invoice Number	Amount	Payments	Balance
05/15/24	43563802	\$3,243.00	\$3,196.24	\$46.76
06/14/24	43569701	\$1,225.40	\$1,205.70	\$19.70
06/21/24	Draft	\$58,528.74	\$0.00	\$58,528.74
Total Balance:				\$58,595.20

AR Balance:

0-30	31-60	61-90	91+	Total
\$58,548.44	\$46.76	\$0.00	\$0.00	\$58,595.20

Questions or concerns, please call 800-846-1201 or email payments@stinson.com

June 21, 2024

Fannie Mae
Legal Department Office Manager
3900 Wisconsin Ave, NW
Washington, DC 20016-2892

Invoice No: Draft
Nicholas Zluticky

Re: Brittany Village Apartments
File No: 0772514.0056

Invoice Summary

Professional services and disbursements rendered through June 21, 2024

Current Professional Services	\$53,057.50
Current Disbursements	\$5,471.24
Total Current Invoice	\$58,528.74

Payment Options

Online Payments:
Stinson.com



Wire/ACH Instructions:
US Bank
Routing No.: 101000187
Acct: Stinson LLP
Account No: 145590256684
Swift Code-USBKUS44IMT
Please reference **File No: 0772514.0056**

Payment by check:

PO Box 843052

Kansas City, MO 64184-3052

Please return this remittance copy with your payment
and reference **File No: 0772514.0056**

Questions or concerns, please call 800-846-1201 or email payments@stinson.com

Payment Terms: Net 30

Tax ID #44-0643135